



USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #: \_\_\_\_\_  
DATE FILED: 5/22/2023

May 18, 2023

**VIA ECF**

Honorable Jennifer H. Rearden, U.S.D.J.  
United States District Court for the  
Southern District of New York  
500 Pearl Street, Room 1010  
New York, NY 10007

Re: Rasul v. R/GA Media Group, Inc., et al.  
Civil Action No.: 1:21-cv-02999

Dear Judge Rearden:

We represent Defendants R/GA Media Group, Inc., the Interpublic Group of Companies, Inc. and Erin Lynch (collectively, “Defendants”) in the above matter filed by Plaintiff Sumeera Rasul (“Plaintiff”). I write with the consent of Plaintiff’s counsel to request a 14-day extension of the deadline set in Paragraph 9(f) of the Civil Case Management Plan and Scheduling Order by which the parties are to file any agreement with respect to the disclosure, discovery and preservation of electronically stored information. The current deadline is today, and the parties respectfully request that a new deadline of June 1, 2023 be set.

The parties have had several recent discussions regarding the scope of ESI discovery and the production of same, and have exchanged a list of applicable custodians and date ranges. Due to the likely volume of the materials, I am in the process of creating a list of search terms to help narrow the results of any search. We recognize that this request is untimely and apologize for as much.

Respectfully submitted,

SEYFARTH SHAW LLP  
*Attorneys for Defendants*

By: /s/ Joseph Vento  
Joseph Vento

cc: All counsel of record (via ECF)

Seyfarth Shaw LLP

620 Eighth Avenue

New York, New York 10018

T (212) 218-5500

F (212) 218-5526

jvento@seyfarth.com

T (212) 218-5548

www.seyfarth.com

Defendants' request on consent to extend the deadline to file an agreement with respect to the disclosure, discovery, and preservation of electronically stored information (ECF No. 35) is GRANTED *nunc pro tunc*. By June 1, 2023, the parties shall file any such agreement.  
SO ORDERED.

A handwritten signature in blue ink that reads "Jennifer H. Rearden".

May 22, 2023